

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 04 - _____
	:	
v.	:	DATE FILED: _____
	:	
KAIRI BAKER	:	VIOLATION:
	:	18 U.S.C. § 924(a)(1)(A) (False statement
	:	in purchase of firearms - 1 Count)

**I N F O R M A T I O N**

**COUNT ONE**

THE UNITED STATES ATTORNEY CHARGES THAT:

1. At all times material to this Information, the following companies possessed a federal firearms license (“FFL”) and were authorized to deal in firearms under federal law:
  - a. C & C Sports Center, located at or about 101 Geiger Road in Philadelphia, Pennsylvania;
  - b. Delia’s Gun Shop, located at or about 6104 Torresdale Avenue in Philadelphia, Pennsylvania; and
  - c. Mike and Kate’s Sport Shoppe, located at or about 7492 Oxford Avenue in Philadelphia, Pennsylvania.
2. FFL holders were licensed, among other things, to sell firearms and ammunition. Various rules and regulations promulgated under the authority of Title 18, United States Code, Chapter 44 (Sections 921-929), govern the manner in which an FFL holder may sell firearms and ammunition.

3. The rules and regulations governing FFL holders required that a person seeking to purchase a handgun fill out a “Firearms Transaction Record,” ATF Form 4473. Part of the Form 4473 required that the prospective purchaser certify truthfully, subject to penalties of perjury, that he was the actual buyer of the firearm. The Form 4473 contained language warning that “[t]he federal firearms laws require that the individual filling out this form must be buying the firearm for himself or as a gift. Any individual who is not buying the firearm for himself/herself or as a gift, but who completes this form, violates the law.”

4. FFL holders were required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder.

5. From on or about May 29, 2003 through on or about July 9, 2003, at Philadelphia, in the Eastern District of Pennsylvania, defendant KAIRI BAKER “straw purchased” the following firearms listed on the chart below on behalf of another individual known to the United States Attorney:

<b>DATE</b>	<b>FFL</b>	<b>FIREARM(S) PURCHASED</b>	<b>SERIAL NUMBER(S)</b>
May 29, 2003	C & C Sports Center 101 Geiger Road Philadelphia, PA	Ruger P97 .45 caliber pistol	633-48346
May 31, 2003	C & C Sports Center 101 Geiger Road Philadelphia, PA	Ruger P97 .45 caliber pistol High Point .45 caliber pistol	633-48344 X402208
May 31, 2003	Mike & Kate’s Sport Shoppe 7492 Oxford Avenue Philadelphia, PA	Keltec P-11 9 mm pistol	130588
June 14, 2003	Delia’s Gun Shop 6104 Torresdale Avenue Philadelphia, PA	Ruger P97 .45 caliber pistol Ruger P97 .45 caliber pistol	633-50771 633-50773

June 25, 2003	C & C Sports Center 101 Geiger Road Philadelphia, PA	High Point JHP .45 caliber pistol	X403742
July 1, 2003	C & C Sports Center 101 Geiger Road Philadelphia, PA	Cobra CA380 .38 caliber pistol  High Point CP 9 mm pistol	CP006841  P155046
July 9, 2003	C & C Sports Center 101 Geiger Road Philadelphia, PA	1 Ruger P97D .45 caliber pistol  High Point CP 9 mm pistol	663-51169  P155048

6. On or about May 31, 2003, in the Eastern District of Pennsylvania and elsewhere, defendant

KAIRI BAKER,

in connection with the acquisition of the firearms listed below from the federally licensed dealer listed below, knowingly made a false statement and representation with respect to the information required by the provisions of Title 18, United States Code, Chapter 44, to be kept in the records of a federally licensed firearms dealer, in that the defendant falsely represented on Form 4473 that he was the actual buyer of the firearms described below, when, in fact, the defendant knew those representations to be false:

DATE	FFL	FIREARMS PURCHASED	SERIAL NUMBERS
May 31, 2003	C & C Sports Center 101 Geiger Road Philadelphia, PA	Ruger P97 .45 caliber pistol  High Point .45 caliber pistol	633-48344  X402208

In violation of Title 18, United States Code, Section 924(a)(1)(A).

---

PATRICK L. MEEHAN  
United States Attorney